

**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF  
TENNESSEE  
WESTERN DIVISION**

**CHARLESTON SHIPP  
PLAINTIFF**

**vs.**

**NO: 2:10-cv-02598-STA-dkv**

**VISIONS SPORTS BAR & GRILL, INC.,  
MARIA LOPEZ, MIKE MURFIK,  
THE CITY OF MEMPHIS, TENNESSEE,  
JIMMY HUDSON, ALKI KING,  
NOEL JACKSON, and JULIAN**

**DEFENDANTS**

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**PLAINTIFF'S SECOND MOTION FOR DEFAULT JUDGMENT AGAINST THE  
DEFENDANTS, VISIONS SPORTS BAR & GRILL, INC AND MIKE FURFIK OR  
MURFIK**

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Comes Now the Plaintiff, Charleston Shipp, by and through undersigned counsel pursuant to Rule 55 of the Federal Rules of Civil Procedure and files herewith his Second Motion for Default Judgment against Visions Sports Bar & Grill, Inc. and Mike Furfik or Mike Murfik and would show this Honorable Court the following:

1. This Court found that Plaintiff filed this Civil Action on August 16, 2010 (DE 24).
2. The Clerk of the Court entered default against Visions Sports Bar & Grill, Inc., and Mike Furfik or Murfik on March 17, 2011. (DE 29).
3. The Plaintiff sustained medical bills of approximately \$90,000.00, experienced intense pain and continues to experience pain, has a large scar, and has experienced nightmares and other mental injuries, and has sustained property

damages as a proximate result of the conduct of Visions Sports Bar and Grill, Inc. and Mike Furfik or Murfik. See the Declaration of Charleston C. Shipp attached herewith as Exhibit 1.

WHEREFORE PREMISES CONSIDERED, the Plaintiff requests the Court to enter Default Judgment in his favor against Vision Sports Bar and Grill, Inc. and Mike Furfik or Murfik in the amount of ONE MILLION FIVE HUNDRED THOUSAND DOLLARS (\$1,500,000.00) with interest accruing at the judicial rate and costs.

Respectfully submitted,

/S/DRAYTON D. BERKLEY  
**DRAYTON D. BERKLEY, ESQ. (022601)**  
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Memphis, Tennessee 38103  
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**And**

**PRECIOUS MOORE COLEMAN (022943)**  
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**CERTIFICATE OF SERVICE & CONSULTATION**

The undersigned hereby certifies a copy of the foregoing has been served upon counsel for the City of Memphis and other Defendants as set forth below. The City

had been dismissed by Order of the Court dated March 2, 2011:

Mr. Zayid A. Saleem  
Assistant City Attorney  
125 North Main Ste Room 336  
Memphis, TN 38103  
Via ECF

Mr. Mike Murfik  
Individually and d/b/a Club Envy  
4069 Lamar Avenue  
Memphis, TN 38118  
Via US Mail

Visions Sports Bar and Grill, Inc  
Individually and d/b/a Club Envy  
4069 Lamar Avenue  
Memphis, TN 38118  
Via US Mail

This the 13<sup>th</sup> day of May 2011.

/s/ Drayton D. Berkley  
**DRAYTON D. BERKLEY, ESQ.**